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February 15, 2000

RECEIVED

MAR 03 2000

Wendy R. Dixon, EIS Project Manager
Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
P.O. Box 30307, Mail Stop 010
North Las Vegas, NV 89036-0307

**RE: Process-Related Comments on Draft Environmental Impact Statement for a
Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level
Radioactive Waste at Yucca Mountain, Nye County, Nevada**

Dear Ms. Dixon:

The following comments on the Draft Environmental Impact Statement (DEIS) are supplemental to Inyo County's official submittal on the DEIS dated January 24, 2000 (received by your office February 11, 2000 via certified mail, USPS Article # Z244-311-273). These comments are offered in Inyo County's capacity as an Affected Unit of Local Government under the Nuclear Waste Policy Act of 1982, as amended.

[Inyo County is concerned about how the Department of Energy (DOE) has pursued development of the DEIS and how DOE will complete processing of the Final Environmental Impact Statement for the proposed Yucca Mountain Repository.

Additional Agency Consultation is Needed

DOE has failed to cooperate and consult adequately with, among others, the National Park Service, California Department of Transportation, California Highway Patrol, California Office of Emergency Services, California Department of Health, the California State Water Resources Control Board, and the (California) Regional Water Quality Control Board. These agencies were not provided with notice or information sufficient to adequately engage their participation in the Yucca Mountain DEIS process. The DEIS fails to recognize the potential range of National and California State agency concerns impacted by repository development and operation. The lack of input from these agencies is a critical shortcoming in the DEIS's function as an information-gathering and disclosure document.]

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Commit to Mitigation in Record of Decision

The impacts identified by California State agencies, Inyo County, and the affected units of local government are of greater significance and broader scope than those identified in the DEIS. We expect that additional mitigation will be identified based on comments received on the DEIS, and request that mitigation be included as part of the Record of Decision, rather than in a separate document.

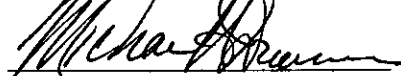
3

New Draft EIS Requires Full Comment Period and Hearings

Inyo County and some Affected Units of Local Government, many stakeholders, and members of the public are calling on DOE to issue a new draft EIS because of the amount of new information that is expected to be added in response to comments. We request that the revised draft EIS be released for a full comment period of 180 days, to include public hearings to be held in the affected units of local government (including Inyo County), in San Bernardino County, California, and in Sacramento, California.

If you have any questions regarding these comments please contact Andrew Remus, Project Coordinator, Inyo County Yucca Mountain Assessment Office at (760) 878-0447.

Very truly yours,



Michael Dorame, Chair
Inyo County Board of Supervisors
Inyo County, California

cc: Senator Barbara Boxer
Senator Dianne Feinstein
Congressman Jerry Lewis
Governor Gray Davis
Secretary Bill Richardson
Ivan Itkin, Director, OCRWM
Affected Units of Local Government
Council on Environmental Quality